

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

HERITAGE GUITAR, INC.,

Case No. 20-cv-229

Plaintiff,

Honorable Hala Y. Jarbou

v.

Magistrate Judge Ray Kent

GIBSON BRANDS, INC.,

Defendant.

**HERITAGE GUITAR, INC.'S MOTION FOR
PARTIAL JUDGMENT ON THE PLEADINGS**

Pursuant to Federal Rule of Civil Procedure 12(c), Plaintiff Heritage Guitar, Inc. (“Heritage”), moves for partial judgment on the pleadings on the following causes of action pending in this litigation: (1) Gibson Brand, Inc.’s (“Gibson”) Counterclaims I and III, ECF No. 61; and (2) Gibson’s Counterclaims II, IV, V, and VI, with respect to Gibson’s allegations based on the Les Paul and ES body shape trademarks (*i.e.*, not the GIBSON trademark), ECF No. 61; and (3) Counts I through V in Heritage’s Second Amended Complaint, ECF No. 104. In accordance with Local Rule 7.1(d), on July 6, 2022, Plaintiff’s counsel sought consent of Defendant’s counsel, which was not granted.

WHEREFORE, Plaintiff respectfully requests that this Court grant its partial motion for judgment on the pleadings.

Dated: July 6, 2022

Respectfully submitted:

By: /s/ Mark A. Ford

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